

# Exhibit A

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**From:** David Gottlieb  
**Sent:** Monday, February 5, 2024 10:19 AM  
**To:** Ditlow, Lindsay; Meyer, Nicholas  
**Cc:** Monica Hincken; Christina Sabato  
**Subject:** RE: Hafizov/BDO

OK. I'll give you a call at 1pm. Thanks,

**David E. Gottlieb**  
Partner  
85 Fifth Avenue  
New York, NY 10003  
Office: 212 257 6800  
Cell: 347-702-3579  
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**From:** Ditlow, Lindsay <[Lditlow@mwe.com](mailto:Lditlow@mwe.com)>  
**Sent:** Monday, February 5, 2024 10:15 AM  
**To:** David Gottlieb <[dgottlieb@wigdorlaw.com](mailto:dgottlieb@wigdorlaw.com)>; Meyer, Nicholas <[Nmeyer@mwe.com](mailto:Nmeyer@mwe.com)>  
**Cc:** Monica Hincken <[mhincken@wigdorlaw.com](mailto:mhincken@wigdorlaw.com)>; Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>  
**Subject:** RE: Hafizov/BDO

Hi David,  
I'm free between 1-4. Please let me know what works best for you

LINDSAY DITLOW  
Partner  
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**Tel** +1 212 547 5425 **Email** [Lditlow@mwe.com](mailto:Lditlow@mwe.com)  
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**From:** David Gottlieb <[dgottlieb@wigdorlaw.com](mailto:dgottlieb@wigdorlaw.com)>  
**Sent:** Monday, February 5, 2024 9:32 AM  
**To:** Ditlow, Lindsay <[Lditlow@mwe.com](mailto:Lditlow@mwe.com)>; Meyer, Nicholas <[Nmeyer@mwe.com](mailto:Nmeyer@mwe.com)>  
**Cc:** Monica Hincken <[mhincken@wigdorlaw.com](mailto:mhincken@wigdorlaw.com)>; Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>  
**Subject:** Re: Hafizov/BDO

[ External Email ]

Lindsay,

Let me know when you have a moment to speak today. Thanks.

David E. Gottlieb  
*Partner*

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**From:** David Gottlieb  
**Sent:** Friday, February 2, 2024 3:45:12 PM  
**To:** Ditlow, Lindsay <[Lditlow@mwe.com](mailto:Lditlow@mwe.com)>; Meyer, Nicholas <[Nmeyer@mwe.com](mailto:Nmeyer@mwe.com)>  
**Cc:** Monica Hincken <[mhincken@wigdorlaw.com](mailto:mhincken@wigdorlaw.com)>; Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>  
**Subject:** RE: Hafizov/BDO

I don't expect to need more than an a couple of hours for the deposition, so there will be no interference with your religious observance—which I took into account despite your assumption that I did not. We will be proceeding that date.

**David E. Gottlieb**  
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**From:** Ditlow, Lindsay <[Lditlow@mwe.com](mailto:Lditlow@mwe.com)>  
**Sent:** Friday, February 2, 2024 3:41 PM  
**To:** David Gottlieb <[dgottlieb@wigdorlaw.com](mailto:dgottlieb@wigdorlaw.com)>; Meyer, Nicholas <[Nmeyer@mwe.com](mailto:Nmeyer@mwe.com)>  
**Cc:** Monica Hincken <[mhincken@wigdorlaw.com](mailto:mhincken@wigdorlaw.com)>; Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>  
**Subject:** RE: Hafizov/BDO

David,

As has been clear from the correspondence between Monica and I, we had all been working together to find mutually convenient dates for all counsel and deponents. I am therefore very surprised by your email noticing a confirmed date for Mr. Sweeney's deposition without any prior notice or offering of potential dates. We are not available on Friday, February 9. And even if we were able to move things to accommodate this date, as I have clearly conveyed to you and your office before, I am a Sabbath observer and have time restrictions and other obligations on Fridays which would require me to end any participation early in the afternoon. Knowingly scheduling a deposition for a day when lead counsel would be unavailable is the epitome of not working together in good faith to manage discovery. Accordingly, please propose alternative dates for Mr. Sweeney's deposition and confirm the deposition will not take place on February 9. Absent confirmation of same by end of day, we will have no choice but to raise this issue with the Court.

Best,  
Lindsay

LINDSAY DITLOW  
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**From:** David Gottlieb <[dgottlieb@wigdorlaw.com](mailto:dgottlieb@wigdorlaw.com)>  
**Sent:** Friday, February 2, 2024 3:21 PM  
**To:** Ditlow, Lindsay <[Lditlow@mwe.com](mailto:Lditlow@mwe.com)>; Meyer, Nicholas <[Nmeyer@mwe.com](mailto:Nmeyer@mwe.com)>  
**Cc:** Monica Hincken <[mhincken@wigdorlaw.com](mailto:mhincken@wigdorlaw.com)>; Christina Sabato <[csabato@wigdorlaw.com](mailto:csabato@wigdorlaw.com)>  
**Subject:** Hafizov/BDO

**[ External Email ]**

Lindsay,

Dennis Sweeney will be appearing for a deposition pursuant to the previously served subpoena on Friday, February 9 at 9:30am. The deposition will take place by Zoom. We will circulate the links next week.

Regards,

**David E. Gottlieb**  
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